

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

)	
In Re:)	
)	
J. Theoginis Kehaias,)	Case No. 11-11833-JMD
)	Chapter 7
Debtor)	
)	

**DEBTOR'S OBJECTION TO CHAPTER 7 TRUSTEE'S
MOTION FOR APPROVAL AND NOTICE OF INTENDED SALE**

NOW COMES the Debtor by his counsel, Kazan, Shaughnessy, Kasten & McDonald, and says as follows:

1. This is a Chapter 7 case which Debtor sought to convert to a Chapter 13 proceeding.
2. The Court (as would generally be the case) allowed conversion to a 13.
3. However, a creditor objected and the current status of the case is that Debtor's request to convert to a 13 was "un-granted" pending a hearing on whether he can convert to a 13, which is set for October 26, 2011.
4. The Trustee now seeks to sell Debtor's ownership interest in an LLC which owns real estate known as 22 Ash Street for \$20,000.00.
5. Debtor objects to any such sale.
6. First, Debtor believes the motion is premature. If he is ultimately allowed to convert to a 13, he will seek to pay off the non-exempt value of his LLC interest (set by the Trustee at \$20,000.00) over the life of the plan.
7. Failing that, he will ask the Court to convert to a Chapter 11 so he can retain his interest in the LLC.

WHEREFORE, the Debtor requests that the Court:

- A. Deny the Motion to Sell; and
- B. Grant such other relief as is just.

Respectfully submitted,

J. THEOGINIS KEHAIAS

By His Attorneys,

KAZAN, SHAUGHNESSY, KASTEN
& MCDONALD, PLLC

Dated: October 12, 2011

By: /s/ Marc W. McDonald
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